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May 31, 2023

Via ECF

Hon. Philip M. Halpern, U.S.D.J.
The Hon. Charles L. Brieant Jr. Federal Building and Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: *Wolf v. Dollar General Corporation, et al.*
Case No.: 7:23-cv-00588-PMH

Dear Judge Halpern:

As you are aware, The Dann Law Firm represents Plaintiffs Joseph Wolf, Carmen Wolf, and the putative class (collectively, the “Wolfs”) in the above referenced matter against Dolgen New York, LLC d/b/a Dolgen (“Dollar General”). In accordance with the Court’s May 31, 2023 Notice to Attorney Regarding Deficient Pleading, we submit the enclosed email by counsel for Dollar General wherein Dollar General not only consents but requests the Wolfs’ filing of their Second Amended Complaint.

Respectfully submitted,

The Dann Law Firm, PC

/s/ Javier L. Merino
Javier L. Merino, Esq.
Counsel for Plaintiffs and the Putative Class

Cc: All Counsel of Record (via ECF)

Enclosure: Email from Dollar General Counsel